

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
<i>Plaintiff,</i>	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
<i>Defendant.</i>	:	
_____	:	

**UNOPPOSED MOTION TO EXTEND DEFENDANT’S
DEADLINE TO REPLY IN SUPPORT OF SUMMARY JUDGMENT**

Defendant Universal Protection Service, LP, d/b/a Allied Universal Security Services, through its counsel, respectfully moves this Honorable Court to extend its deadline to reply in support of its motion for summary judgment. Consistent with LR 7, the parties having conferred and the relief sought by this motion being unopposed, in support of this motion Defendant states as follows:

1. On January 9, 2025, this Court entered an Order granting the Unopposed Motion to Extend the Summary Judgment Response and Reply Deadlines (the “Order”). *See* ECF No. 33.
2. The Order requires any reply in support of Defendant’s Motion for Summary Judgment to be filed on or before February 21, 2025. *See id.*
3. Consistent with Local Rule 7.4, a reply to an opposed motion may be filed within 7 days from the date the response is filed unless otherwise directed by the presiding judge.
4. Unfortunately, our office cycled through the norovirus last week resulting in significant absences and the inability to work as originally intended. Additionally, the undersigned

counsel has had conflicts with overlapping deadlines, including intensive deposition schedules completing eight in the last three weeks and an additional four scheduled for the next two weeks. Therefore, Defendant respectfully requests its deadline to reply in support of its dispositive motion to be extended through and including Friday, March 14, 2025. *See generally*, Fed. R. Civ. P. 6(b).

WHEREFORE, and for good cause being shown, Defendant Allied Universal Protection Service, LP d/b/a Allied Universal Security Services, respectfully moves this Honorable Court to extend the deadline to file a reply in support of its motion for summary judgment through including March 14, 2025.

Dated: February 20, 2025

Respectfully submitted,

MARTENSON, HASBROUCK & SIMON LLP

/s/ Jessica E. Chang

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CERTIFICATE OF CONFERENCE

The undersigned certifies that on February 18, 2025, that defense counsel communicated with Plaintiff's counsel Amanda C. Hernandez about the relief requested in the motion and Ms. Hernandez informed that Plaintiff did not oppose the requested relief in this motion.

/s/ Jessica Chang
Jessica Chang

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2025, I caused to be file a true and correct copy of the foregoing *Unopposed Motion to Extend Defendant's Deadline to Reply in Support of Summary Judgment* via the Court's CM/ECF system, effecting service on all counsel and parties of record including:

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/s/ Jessica Chang
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